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June 30, 2022

BY ECF

Honorable John P. Cronan
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Joseph Srour v. City of New York et. al.,
22-CV-0003 (JPC)

Your Honor:

I am an attorney in the office of Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, attorney for defendants City of New York ("City") and New York City Police Department ("NYPD") Commissioner Keechant Sewell in the above-entitled action. Pursuant to Your Honor's Order dated March 14, 2022, this matter was stayed pending a decision by the U.S. Supreme Court in the matter of New York State Rifle & Pistol Assoc. v. Bruen ("Bruen"), and the parties were directed to file a letter update and proposed case management plan or pre-motion conference letter within seven days following the issuance of the Bruen decision. As the Court is no doubt aware, the Bruen decision was released on June 23, 2022. As a result of the decision, the New York State legislature has convened a special session beginning today to enact new firearm license laws. As such, defendants respectfully request an additional 30 days to file a joint update and case management plan or pre-motion conference letter. This brief enlargement will ensure that the parties can properly consider how this matter is affected by the Bruen decision and the State's anticipated new regulations in determining their positions and setting a case management plan.

I have conferred with plaintiff's counsel about this request, and have been informed that plaintiff takes no position on a 30 day enlargement of the stay and the time to update the court. For the reasons set forth above, defendants respectfully request that the court grant a 30 day enlargement, until July 25, 2022, for the parties to update the Court regarding case scheduling and/or motions.

Respectfully submitted,

/S
Aimee K. Lulich